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11 **UNITED STATES DISTRICT COURT**
12 **DISTRICT OF NEVADA**

13 JOSEPH O'SHAUGHNESSY, et al.

14 Plaintiffs,

15 v.

16 UNITED STATES OF AMERICA,

17 Defendants.

Case No.: 2:22-cv-01039-WQH-EJY

18 TODD C. ENGEL,

19 Plaintiff,

20 v.

21 UNITED STATES OF AMERICA,

22 Defendants.

Case No.: 2:22-cv-01040-WQH-EJY

SUPPLEMENTAL STATUS REPORT

23 Plaintiffs Joseph O'Shaughnessy, Jason D. Woods, Mel Bundy and Dave Bundy
24 (hereinafter the "Tier 2 Plaintiffs") and the Bundy Family Members (i.e., Marylynn Bundy,
25 Briana Bundy, Brett Roy Bundy, Maysa Lynn Bundy, Dally Anne Bundy, Bronco Cliven Bundy,
26 Payton Alma Bundy, Piper Bodel Bundy, Montana Bundy, Bentile Bundy, Presly Bundy, Kymber
27 Bundy and Adahlen Bundy) hereinafter collectively "the O'Shaughnessy Plaintiffs," Todd Engel
28 ("Engel" - the Related Action Plaintiff) and the United States of America ("USA"), by and
through their respective counsel of record hereby update the Court in furtherance of their Joint

Status Reports filed on November 30, 2023 (i.e., ECF No. 52 in *O'Shaughnessy*; ECF No. 44 in *Engel*) and, in accordance with the Court's January 17, 2023 Minute Orders (i.e., ECF No. 30 in *O'Shaughnessy*; ECF No. 23), the parties have been conferring, in good faith, regarding: (1) the appropriateness of an Order consolidating both matters pursuant to Fed.R.Civ.P. 42; (2) the entry of a Protective Order to govern discovery in the companion cases; (3) the need for an extended discovery schedule to be completed in phases due to the large quantity of documents to review before some discovery decisions can be made. The parties ask the Court's permission to submit their discovery plan and proposed scheduling order on or before February 1, 2024.

RESPECTFULLY SUBMITTED this 16th day of January, 2024.

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MERRICK GARLAND
United States Attorney General

By: /s/ Craig A. Marquiz, Esq.
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By: /s/ Brock Heathcotte, Esq.
Brock Heathcotte, Esq.
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Special Assistant US Attorneys,
Acting Under Authority Conferred by
28 U.S.C. § 515
Counsel for Defendant United States

ORDER

Pursuant to Stipulation and good cause appearing,
IT IS ORDERED that the parties shall have through February 1, 2024 to submit their
Discovery Plan & Scheduling Order.

Dated this ____ day of January, 2024.

United States District Court Judge